

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Retail Access Optimization Initiative

Docket No. N2011-1

PUBLIC REPRESENTATIVE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS TO UNITED STATES POSTAL SERVICE
(PR/USPS-18-24)

(September 9, 2011)

Pursuant to Rules 25 through 28 of the Postal Regulatory Commission Rules of Practice, the Public Representative hereby submits the following interrogatories and requests for production of documents. Definitions and instructions included with the Public Representative's interrogatories PR/USPS- T1- 1-5, dated August 1, 2011, are hereby incorporated by reference.

Respectfully Submitted,

/s/ Tracy N. Ferguson
Tracy N. Ferguson
Public Representative for
Docket No. N2011-1

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PR/USPS-18

Please confirm that the following post offices are listed in USPS-LR-2, but not included in USPS-LR-12:

	ZIP CODE	Name	Facility	City	State
1	2584	NANTUCKET STATION 1 THEOLOGICAL	STATION	NANTUCKET	MA
2	22304	SEMINARY	FND_S	ALEXANDRIA	VA
3	22433	BURR HILL	MAIN_PO	BURR HILL	VA
4	22451	DOGUE	MAIN_PO	DOGUE	VA
5	22513	MERRY POINT	MAIN_PO	MERRY POINT	VA
6	22523	MORATTICO	MAIN_PO	MORATTICO	VA
7	22529	OLDHAMS	MAIN_PO	OLDHAMS	VA
8	22548	SHARPS	MAIN_PO	SHARPS	VA
9	22552	SPARTA	MAIN_PO	SPARTA	VA
10	22577	SANDY POINT	MAIN_PO	SANDY POINT	VA
11	22723	HOOD	MAIN_PO	HOOD	VA
12	22738	ROCHELLE	MAIN_PO	ROCHELLE	VA
13	22743	SYRIA	MAIN_PO	SYRIA	VA
14	22748	WOLFTOWN	MAIN_PO	WOLFTOWN	VA
15	22820	CRIDERS	MAIN_PO	CRIDERS	VA
16	22845	ORKNEY SPRINGS	MAIN_PO	ORKNEY SPRINGS	VA
17	22957	MONTPELIER STATION	MAIN_PO	MONTPELIER STATION	VA
18	23064	GRIMSTEAD	MAIN_PO	GRIMSTEAD	VA
19	23105	MANNBORO	MAIN_PO	MANNBORO	VA
20	23125	NEW POINT	MAIN_PO	NEW POINT	VA
21	23126	NEWTOWN	MAIN_PO	NEWTOWN	VA
22	23130	ONEMO	MAIN_PO	ONEMO	VA
23	23147	RUTHVILLE	MAIN_PO	RUTHVILLE	VA
24	23154	SCHLEY	MAIN_PO	SCHLEY	VA
25	23219	CAPITOL	FIN_S	RICHMOND	VA
26	23220	SAUNDERS	FIN_S	RICHMOND	VA
27	23222	NORTHSIDE	FIN_S	RICHMOND	VA
28	23223	EAST END	STATION	RICHMOND	VA
29	23224	SOUTHSIDE	STATION	RICHMOND	VA
30	23241	CENTRAL RICHMOND	STATION	RICHMOND	VA
31	23302	ASSAWOMAN	MAIN_PO	ASSAWOMAN	VA
32	23341	CRADDOCKVILLE	MAIN_PO	CRADDOCKVILLE	VA
33	23389	HARBORTON	MAIN_PO	HARBORTON	VA
34	23404	LOCUSTVILLE	MAIN_PO	LOCUSTVILLE	VA
35	23408	MARIONVILLE	MAIN_PO	MARIONVILLE	VA
36	23426	SANFORD	MAIN_PO	SANFORD	VA
37	23427	SAXIS	MAIN_PO	SAXIS	VA
38	23443	TOWNSEND	MAIN_PO	TOWNSEND	VA
39	23486	WILLIS WHARF	MAIN_PO	WILLIS WHARF	VA
40	23488	WITHAMS	MAIN_PO	WITHAMS	VA

41	23509	LAFAYETTE	STATION	NORFOLK	VA
42	23514	CUSTOMHOUSE	STATION	NORFOLK	VA
43	23523	BERKLEY	STATION	NORFOLK	VA
44	23605	PARKVIEW	STATION	NEWPORT NEWS	VA
45	23663	PHOEBUS	STATION	HAMPTON	VA
46	23665	LANGLEY AFB	STATION	HAMPTON	VA
47	23873	MEREDITHVILLE	MAIN_PO	MEREDITHVILLE	VA
48	23876	RAWLINGS	MAIN_PO	RAWLINGS	VA
49	23897	YALE	MAIN_PO	YALE	VA
50	23934	CULLEN	MAIN_PO	CULLEN	VA
51	23938	DUNDAS	MAIN_PO	DUNDAS	VA
52	24411	AUGUSTA SPRINGS	MAIN_PO	AUGUSTA SPRINGS	VA
53	24412	BACOVA	MAIN_PO	BACOVA	VA
54	24432	DEERFIELD	MAIN_PO	DEERFIELD	VA
55	24433	DOE HILL	MAIN_PO	DOE HILL	VA
56	24438	GLEN WILTON	MAIN_PO	GLEN WILTON	VA
57	24442	HEAD WATERS	MAIN_PO	HEAD WATERS	VA
58	24464	MONTEBELLO	MAIN_PO	MONTEBELLO	VA
59	24483	VESUVIUS	MAIN_PO	VESUVIUS	VA
60	24487	WILLIAMSVILLE	MAIN_PO	WILLIAMSVILLE	VA
61	27858	ECU STATION	STATION	GREENVILLE	NC
62	29062	HORATIO	MAIN_PO	HORATIO	SC
63	29082	LODGE	MAIN_PO	LODGE	SC
64	29434	CORDESVILLE	MAIN_PO	CORDESVILLE	SC
65	29447	GROVER	MAIN_PO	GROVER	SC
66	29476	RUSSELLVILLE	MAIN_PO	RUSSELLVILLE	SC
67	29493	WILLIAMS	MAIN_PO	WILLIAMS	SC
68	30285	THE ROCK	MAIN_PO	THE ROCK	GA
69	30303	PHOENIX STATION	FIN_S	ATLANTA	GA
70	30303	PEACHTREE CENTER	FIN_S	ATLANTA	GA
71	30310	WEST END	STATION	ATLANTA	GA
72	30311	CASCADE HEIGHTS	STATION	ATLANTA	GA
73	30315	LAKEWOOD	STATION	ATLANTA	GA
74	30345	NORTHLAKE	FIN_S	ATLANTA	GA
75	30502	CHESTNUT MOUNTAIN	FIN_B	CHESTNUT MOUNTAIN	GA
76	43920	CALCUTTA	FIN_B	EAST LIVERPOOL	OH
77	44607	AUGUSTA	MAIN_PO	AUGUSTA	OH
78	72231	GMF BOX SECTION	FIN_S	LITTLE ROCK	AR

PR/USPS-19

Please provide ZIP Code information for the following Post Offices listed in USPS-LR-12:

District Name	Office	Fac ID	State	Zip	Near Office	Near Miles
Atlanta	Cascade		GA		Ben Hill Sta	4.5
Atlanta	Lakewood		GA		East Atlanta Sta.	5.6
Atlanta	Northlake		GA		Briarcliff Station	4.0
Atlanta	Peachtree Center		GA		Civic Center Sta	0.9
Atlanta	Phoenix		GA		Central City Station	1.0
Atlanta	West End		GA		Morris Brown Station	1.9

PR/USPS-20

Please provide a revised response to PR/USPS-T1-13 that includes a crosswalk with the information regarding BEMU and Carrier Operations at RAOI facilities provided in USPS-LR-NP6.

PR/USPS-21

The following question concerns Operating Revenue and Operating Cost for a post office as detailed in USPS-LR-NP3, Walk in Revenue as detailed in USPS-LR-NP5, and postal operations as detailed in USPS-LR-NP6

- a. What was the FY 2010 Operating Cost and Operating Revenue for the post office as identified in USPS-LR-NP3 row 28799?
- b. What was the FY 2010 walk in revenue for this post office as identified in LR- NP5 row 3434?
- c. What was the earned workload of this office in FY 2010?
- d. According to USPS-LR-NP 6 row 17683:
 - i. What was the EAS level of this office?
 - ii. Does this location have a BMEU
- e. Is the EAS level of this office as identified in USPS-LR-NP6 the same as implied by USPS-LR-2
- f. If the retail location is closed, will the BMEU move?
- g. How will the co-location of this office with a BMEU impact the discontinuance process?
- h. Is it accurate to infer that the difference between the walk in revenue and the total operating revenue is generated by the BMEU?
- i. What was the cost of offering retail postal services for this location in FY 2010?
- j. What was the cost of operating the BMEU in FY 2010?
- k. Do the costs identified in parts h. and i. equal the total operating cost identified in part a.?
- l. Would the cost savings of discontinuing this location be the costs identified in part a. or part i. or neither? If neither, please provide a calculation of the cost savings associated with discontinuing this location with linked information sources provided in excel format.

PR/USPS-22

Please discuss how the USPS-LR-1 handbook process requires the discontinuance team to:

- a. Identify if the facility under review is currently co-located with a BMEU?
- b. Isolate the revenue and costs associated with the BMEU?
- c. Evaluate the potential revenue loss associated with moving the BMEU?
- d. Solicit comments from mailers who use the BMEU regarding the effect of moving the BMEU?

PR/USPS-23

In Library Reference Nonpublic 3, the Postal Service provided operating cost and operating revenue data for over 30000 postal retail locations.

- a. How many offices had Operating Revenue that exceeded Operating Cost in FY2010?
- b. How many RAO offices had Operating Revenue that exceeded Operating Cost in FY2010?
- c. If the Discontinuance study reveals that the office is, in fact, operating at a profit, how will that impact your evaluation of whether that post office should close?

PR/USPS-24

USPS-LR-NP3 contains information regarding post office operating costs and revenues.

- a. How many post offices within the Albuquerque district are listed in USPS-LR-NP3?
- b. How many post offices are in the Albuquerque district?